

U.S. DISTRICT COURT

2012 FEB 15 PM 4:00

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA )  
 ) Criminal No. 12-30  
 v. )  
 ) (29 U.S.C. §§ 439(c) & 501(c))  
 THOMAS CONLEY )

INDICTMENT

The Grand Jury charges:

INTRODUCTION

1. At all times material hereto, Amalgamated Transit Union (ATU) Local 1738, was affiliated with the International Amalgamated Transit Union, a labor union which represents transit workers in the United States and Canada. Its members consist of bus, van, subway and light rail operators employed in urban transit, over-the-road, and the school bus industries.

2. At all times material hereto, ATU Local 1738 was a labor organization engaged in an industry affecting interstate commerce.

3. At all times material hereto, the Defendant, THOMAS CONLEY, was an officer of ATU Local 1738.

COUNT ONE

4. The allegations set forth in paragraphs one through three of this Indictment are incorporated herein as if set forth in full.

5. From in and around December, 2008, until in and around April, 2010, in the Western District of Pennsylvania, the Defendant, THOMAS CONLEY, while an officer of ATU Local 1738, did embezzle, steal, and unlawfully and willfully abstract and convert to his own use, and for the use of another, moneys, funds, property and assets of ATU Local 1738, to wit, the Defendant, THOMAS CONLEY, unlawfully and without authorization, did embezzle, steal and convert to his own use, unauthorized excess monthly salary payments, unauthorized monthly office rent, and unauthorized and excessive mileage and fuel reimbursement claims, which funds the Defendant knew were not for any union benefit, totaling approximately \$15,432.26.

In violation of Title 29, United States Code, Section 501(c).

COUNT TWO

The Grand Jury further charges:


6. The allegations set forth in paragraphs one through three of this Indictment are incorporated herein as if set forth in full.

7. From in and around December, 2008, until in around about April, 2010, in the Western District of Pennsylvania, the Defendant, THOMAS CONLEY, as an officer of ATU Local 1738, willfully made, and did cause to be made, false entries in records required to be maintained by Section 436 of Title 29, United States Code, that is, the Defendant, THOMAS CONLEY, did prepare and submit false, fraudulent and unauthorized voucher requests for salary, office rent, and mileage and fuel reimbursement, which voucher requests the Defendant knew were false and fraudulent.

In violation of Title 29, United States Code, Section 439(c).

A True Bill,

  
FOREPERSON

  
\_\_\_\_\_  
DAVID J. HICKTON  
United States Attorney  
PA ID No. 34524